

1 HEATHER E. WILLIAMS, SBN 122664  
2 Federal Defender  
3 CHRISTINA SINHA, SBN 278893  
4 Assistant Federal Defender  
5 Designated Counsel for Service  
6 801 I Street, Third Floor  
7 Sacramento, CA 95814  
8 T: (916) 498-5700  
9 F: (916) 498-5710

10 Attorneys for Defendant  
11 MARIELA PANGANIBAN

12  
13 IN THE UNITED STATES DISTRICT COURT  
14 FOR THE EASTERN DISTRICT OF CALIFORNIA

15 UNITED STATES OF AMERICA, ) Case No. 2:21-CR-32-TLN  
16 Plaintiff, )  
17 vs. ) **STIPULATION AND ORDER TO CONTINUE**  
18 MARIELA PANGANIBAN, ) **STATUS ON SENTENCING**  
19 Defendant. )  
20 \_\_\_\_\_ ) Date: October 28, 2021  
21 ) Time: 10:00 A.M.  
22 ) Judge: Hon. Troy L. Nunley  
23 \_\_\_\_\_ )  
24 )

25 IT IS HEREBY STIPULATED and agreed by and between Acting United States  
26 Attorney Phillip A. Talbert, through Assistant United States Attorney Matthew Thuesen, counsel  
27 for Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender  
28 Christina Sinha, counsel for Ms. Mariela Panganiban, that the status regarding sentencing,  
currently set for October 28, 2021 may be continued to **December 02, 2021 at 9:30 A.M.**

The parties specifically stipulate as follows:

1. On September 12, 2021, the previously-assigned district judge, the Hon. Morrison C. England, signed an order of recusal, and this matter was reassigned to the Hon. Troy L. Nunley for all further proceedings, with all previously-set dates vacated. ECF No. 24. A minute order was issued later that day setting the status conference on sentencing for its currently-set date of October 28, 2021.
2. By stipulation, the defense now moves to continue the status conference to

1 December 02, 2021.

2 3. Undersigned defense counsel was newly assigned this case in mid-July 2021.  
3 ECF No. 18. As such, she requires time to review the discovery in this matter and  
4 otherwise prepare for sentencing.  
5 4. Defense counsel believes that failure to grant the requested continuance would  
6 deny her the reasonable time necessary for effective preparation, taking into  
7 account the exercise of due diligence.  
8 5. The government does not object to the continuance.  
9 6. As this matter is post-plea, there are no Speedy Trial Act considerations.  
10 7. Therefore, the parties respectfully request the Court to set this matter for a status  
11 regarding sentencing on December 02, 2021 at 9:30 A.M.

12 Respectfully submitted,

13 14 HEATHER E. WILLIAMS  
Federal Defender

15 Date: October 26, 2021

16 /s/ Christina Sinha  
CHRISTINA SINHA  
17 Assistant Federal Defender  
Attorneys for Defendant  
MARIELA PANGANIBAN

18  
19 Date: October 26, 2021

PHILLIP A. TALBERT  
Acting United States Attorney

21 /s/ Matthew Thuesen  
22 Matthew Thuesen  
23 Assistant United States Attorney  
Attorneys for Plaintiff

## ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: October 26, 2021

  
Troy L. Nunley  
United States District Judge